

# Exhibit A

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

HEIDI WOEBBEKING, )  
*individually and on behalf of those* )  
*similarly situated,* )  
                        )  
Plaintiff,             ) Case No. 1:24-cv-01871-CL  
                        )  
v.                     )  
                        )  
SHARI'S MANAGEMENT )  
CORPORATION; GATHER HOLDINGS )  
GUARANTEE, LLC,      )  
                        )  
                        )  
Defendants.           )

**DECLARATION OF NATHAN R. RING**

Nathan R. Ring declares as follows:

1. I am one of the attorneys for Plaintiff Heidi WoebbeKing in this matter.
2. Plaintiff filed her initial complaint on November 12, 2024, and a corrected complaint on November 13, 2024. See ECF Nos. 1–3.
3. Defendant Shari's Management Corporation was served with the summons, complaint, and civil cover sheet on November 20, 2024, so that its responsive pleading or Rule 12 motion was due on December 11, 2024. See ECF No. 7.
4. Defendant Gather Holdings Guarantee, LLC, was served with the summons, complaint, and civil cover sheet on November 20, 2024, and again on December 18, 2024, through its registered agents in Oregon and Delaware, so that its responsive pleading or Rule 12 motion was due, at the latest, on January 8, 2025. See ECF Nos. 8–9.
5. All Defendants have failed to appear and have failed to answer or move under Rule 12 within the time allowed by the Rules.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 30, 2025.

*/s/ Nathan R. Ring, Esq.*